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January 8, 2002

VIA ELECTRONIC FILING

Magalie R. Salas, Esq.

Secretary

Federal Communication Commission

445-12th Street, SW

Room TW-B204

Washington, DC 20054

RE: *CC Docket No. 95-182/ Tariff Transmittal No. 1260*
AT&T Alascom Tariff F.C.C. No. 11

Dear Secretary Salas:

ACS Long Distance (“ACS-LD”), formerly known as ATU-Long Distance, supports the Commission’s decision, issued December 26, 2001, to suspend and investigate AT&T Alascom’s latest revision to its Tariff F.C.C. No. 11 (“Tariff 11”), contained in Transmittal No. 1260.

For a number of years, ACS-LD has filed comments urging the Commission to suspend AT&T Alascom’s annual Tariff 11 revision. Each year, AT&T Alascom has failed to supply proper and reasonable cost support, has developed costs in violation of the Communications Act and relevant Commission orders, and has generated rates too high, overall, for the services provided. The Commission concurred with this analysis in its Order, stating that each of the past twelve tariff transmittals filed (Nos. 790, 797, 807, 852, 921, 933, 937, 941, 942, 993, 1088, and 1184) have raised questions regarding the adequacy of Alascom’s cost support and the extent to which the proposed Tariff 11 rates, terms and conditions comply with the Communications Act and relevant Commission orders. The Commission found that Transmittal No. 1260 is similarly flawed.

Tariff 11 is an extremely important tariff to promote long distance competition in Alaska. As the Commission has well documented in its Alaska Market Structure Inquiry, the costs of serving Alaska are very high. Through this tariff, other carriers serving Alaska can buy transport and switching services to avoid having to build their own facilities to serve Alaskan customers. Thus, the tariff enables carriers to serve the state in a more economical and efficient manner.

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ACS-LD urges the Commission to conduct the inquiry that it has reinstated each year upon the annual Tariff 11transmittal filing.

Sincerely,

BIRCH, HORTON, BITTNER
AND CHEROT

Elisabeth H. Ross
Attorney for ACS-Long Distance

cc: Tamara L. Preiss
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